

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

ESTATE OF	:	
ROGER D. OWENSBY JR., et al.,	:	
	:	
	:	Case No. 01-CV-769
Plaintiff,	:	
	:	Senior Judge S. Arthur Spiegel
v.	:	
	:	
CITY OF CINCINNATI, et al.,	:	
	:	
	:	
Defendants.	:	

**PLAINTIFF'S NOTICE OF FILING DEPOSITION EXCERPTS IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT  
AGAINST DEFENDANTS CITY OF CINCINNATI, ITS CHIEF OF POLICE  
AND ITS INDIVIDUAL POLICE OFFICERS  
FOR THEIR FAILURE TO PROVIDE CRITICAL MEDICAL CARE**

Plaintiff hereby provides notice of filing the attached deposition excerpts in support of Plaintiff's Motion For Partial Summary Judgment Against Defendants City Of Cincinnati, Its Chief Of Police And Its Individual Police Officers For Their Failure To Provide Critical Medical Care, which is being filed concurrently herewith.

Respectfully submitted,

Mark T. Tillar (0029898)  
240 Clark Road  
Cincinnati, Ohio 45202

John J. Helbling (0046727)  
3672 Springdale Road  
Cincinnati, Ohio 45251

/s/Paul B. Martins  
James B. Helmer, Jr. (0002878)  
Paul B. Martins (0007623)  
Frederick M. Morgan, Jr. (0027687)  
HELMER, MARTINS & MORGAN CO., LPA  
Fourth & Walnut Centre, Suite 1900  
105 East Fourth Street  
Cincinnati, Ohio 45202-4008  
Telephone: (513) 421-2400  
Facsimile: (513) 421-7902

*Trial Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Plaintiff's Notice Of Filing Deposition Excerpts In Support Of Plaintiff's Motion For Partial Summary Judgment Against Defendants City Of Cincinnati, Its Chief Of Police And Its Individual Police Officers For Their Failure To Provide Critical Medical Care was electronically filed on February 2, 2004. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Paul B. Martins